

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

DEC 14 2023

PRO SE PRISONER CIVIL RIGHTS COMPLAINT

BONNIE HACKLER
Clerk, U.S. District Court

By

Deputy Clerk

Jai' Quez Koreante Law
Plaintiff's full name (Please print)

Case No. **23 CIV 421 JFH**

v.

(To be filled out by Clerk's
Office only)

Chris Bryant individually and officially
Defendant(s) full name (Please print)

Devra Atwood individually and officially

Turn Key Medical

Josephine Oloo LPN individually and officially

Amanda LPN individually and officially

For additional names please write "see attached" in the space
above and attach an additional sheet of paper with the full list
of names. The names listed in the above caption must be
identical to those contained in Section IV, pursuant to Fed.
R. Civ. P. 10(a).

NOTICE

Federal Rule of Civil Procedure 5.2 and Local Civil Rule 5.3 address the privacy and security concerns resulting from public access to electronic court files. Under these rules, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Each claim you raise must be properly exhausted. If the evidence shows that you did not fully comply with an available prison grievance process prior to filing this lawsuit, the court may dismiss the unexhausted claim(s) or grant judgment against you. See 42 U.S.C. 1997e(a).

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

I. JURISDICTION

Indicate below the federal legal basis for your claim, if known.

- ☒ 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Action under *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (federal defendants)

II. PLAINTIFF INFORMATION

Jai'Quez Koreante Law

Full name

Aliases

Prisoner ID #

Carter County Detention Center

Place of Detention/Incarnation

100 S. Washington

Institutional Address

Armore

City

Oklahoma

State

73401

Zip Code

III. PRISONER STATUS

Indicate whether you are a prisoner or other confined person as follows:

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

IV. DEFENDANT(S)' INFORMATION

List the following information for each defendant. If the correct information is not provided, it could result in the delay or prevention of service. Make sure that the defendant(s) listed below are identical to those contained on the first page. Attach additional sheets of paper as necessary. Do not write on the backs of any additional sheets. See Local Civil Rule 5.2(a).

Defendant 1:

Chris Bryant individually and officially
Full Name

Sheriff of Carter County
Current Job Title

100 S Washington
Current Work Address

City

Ardmore

OK

State

73401

Zip Code

Defendant 2:

Devra Atwood individually and officially
Full Name

Jail Administrator
Current Job Title

100 S Washington
Current Work Address

City

Ardmore

OK

State

73401

Zip Code

Defendant 3:

Turnkey Medical Services

Full Name

jail medical provider

Current Job Title

100 S. Washington

Current Work Address

Ardmore

City

OK

State

73401

Zip Code

Defendant 4:

Josephine O'Loon LPN individually and

Full Name

Nurse Practitioner at Turnkey

Current Job Title

100 S Washington

Current Work Address

Ardmore

City

OK

State

73401

Zip Code

Defendant 5:

Amanda LPN individually and officially

Full Name

LPN nurse for Turn Key

Current Job Title

100 S Washington

Current Work Address

Ardmore

City

OK

State

73401

Zip Code

V. STATEMENT OF CLAIMS

A. Claim 1

Date(s) of occurrence: 10 - March - 2023

Place(s) of occurrence: Book-in @ Carter County Detention Center

State which of your federal constitutional or federal statutory rights have been violated:

8th and 14th amendments

Briefly state the FACTS that support your case. Provide a short and plain statement of how each named defendant was personally involved in the violation of your constitutional rights and why you are entitled to relief from each named defendant. See Fed. R. Civ. P. 8(a). Do not cite case law.

FACTS: I was booked-in on 10 March 2023
and I told the officer during the
medical questioning that I had severe
eczema that bled constantly if left
untreated and that I needed the medication
my physician had prescribed (unknown pills and)
she said no. cream

B. Claim 2

Date(s) of occurrence: 10 May 2023

Place(s) of occurrence: Carter County Detention Center

State which of your federal constitutional or federal statutory rights have been violated:

14th amendment

FACTS: I was seen at medical by
Josephine Oloo nurse practitioner and I
was bleeding from dinner plate sized abrasions
where I had scratched myself. She said
she wouldn't give me anything and sent
me back to gen. pop. untreated

C. Claim 3

Date(s) of occurrence: 10-28-2023 - 11-18-2023

Place(s) of occurrence: Carter County Detention Center

State which of your federal constitutional or federal statutory rights have been violated:

14th amendment

FACTS:

wrote grievance and jail administrator Devin Atwood changed it to medical request. Back bleeding through t-shirts abrasions increased to size of 2 dinner plates. Pain and itching unbearable. Amanda the nurse told me nothing can be done.

D. Claim 4

Date(s) of occurrence: 14-11-Dec-2023 - 5-Dec-2023

Place(s) of occurrence: Carter County Detention Center

State which of your federal constitutional or federal statutory rights have been violated:

8th amendment cruel & unusual punishment

FACTS:

Pain unbearable, put in medical request told jailers. Asked for sheriff's nurse told me nothing she would do. Tried to get them to take me to E.R. told no by nurse Amanda

VI. RELIEF REQUESTED

Briefly state what you want the Court to do for you. Do not make legal arguments or cite cases or statutes.

injunctive relief requiring Turkey personnel to be trained in civil rights as related to medical procedures also \$50,000 punitive damages from each individual also \$500,000 punitive from Turkey Medical. Jury trial if possible. Total Punitive damages of \$700,000 - seven hundred thousand dollars

VII. PRISONER'S LITIGATION HISTORY

The "Three Strikes Rule" bars a prisoner from bringing a civil action or an appeal in forma pauperis in federal court if the prisoner has "on three or more occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

Have you brought any other lawsuits in federal court while a prisoner?

☐ Yes

☒ No

If yes, how many? _____

Number each different lawsuit below and include the following:

- Name of case (including defendants' names), court, and docket number
- Nature of claim made
- How did it end? (For example, if it was dismissed, appealed, or is still pending, explain below.)
- Did the court assess a "Strike" or find the dismissal a "Prior Occasion" pursuant to 28 U.S.C. 1915 (g).

Dear Sirs:

I realize my complaint does not contain my commissary account information. I have requested this information through our kiosk system of communication only to be told "Have your attorney get it". The jail administration has refused to provide names for the medical staff or themselves and they do not wear name tags or identify themselves when I have asked. I have been told "That is so you can't sue us". I was sentenced to Oklahoma DOC in October of 2023 and am waiting to be transferred. Unfortunately this county routinely makes us wait an additional 6-8 months after we have been sentenced to take us to LARC. I could receive medical attention there. I have been bleeding and in constant agony for the entire 10 months I've been here. Please make them help me or transfer me immediately.

Sincerely

Jai Quez Law